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| 6              | Attorneys for Defendant  |  |  |
| 7              | FORD MOTOR COMPANY   |  |  |
| 8              | UNITED STATES DISTRICT COURT   |  |  |
| 9              | NORTHERN DISTRICT OF CALIFORNIA  |  |  |
| 10             | •  |  |  |
| 11             | DAX PIERSON  | ) Case No.: C-06-06503 PJH                                     |  |
| 12             | Plaintiff,   | ) JOINT MOTION TO EXTEND TIME TO                               |  |
| 13             | vs.  | <ul><li>COMPLETE PRIVATE MEDIATION</li><li>AND ORDER</li></ul> |  |
| 14<br>15       | PATRICK SCOTT; ON THE MOVE, INC.;<br>DIGBY ADLER GROUP, LLC; BANDAGO<br>VAN RENTAL; AND DOES 1-50, inclusive | )<br>)<br>)  |  |
| 16             | Defendants,  | )<br>)<br>)  |  |
| 17<br>18<br>19 | DIGBY ADLER GROUP, LLC., dba<br>BANDAGO VAN RENTAL, and ON THE<br>MOVE, INC.,                                | )<br>)<br>)<br>)   |  |
| 20             | Cross-Complainants,  | )<br>)   |  |
| 21             | vs.  | )<br>)   |  |
| 22             | FORD MOTOR COMPANY   | )<br>)   |  |
| 23             | Cross-Defendant,   | )<br>)   |  |
| 24             |  |  |  |
| 25             |  |  |  |
| 26             | Plaintiff Dax Pierson ("Pierson") and Def  | Gendant Ford Motor Company ("Ford") have met                   |  |
| 27             | and conferred with respect to conducting a mediation in this case and respectfully move this Court to        |  |  |
| 28             |  | JOINT MOTION TO EXTEND TIME TO COMPLETE PRIVATE MEDIATION      |  |

| 127083V1

CASE NO.<u>C-06-06503 PJH</u>

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| 1  | amend its May 30, 2007 requiring the partie | es to complete mediation by August 31, 2007.                 |
|----|---|--|
| 2  | The parties are currently engaged in        | expert discovery and will not be prepared to complete a      |
| 3  | meaningful mediation by August 31, 2007.    | The parties seek an order extending the time to complete     |
| 4  |   | for further expert discovery and a meaningful mediation.     |
| 5  |   |  |
| 6  | DATED:, 2007                                | SHOOK, HARDY & BACON, L.L.P.                                 |
| 7  |   | •  |
| 8  |   | By <u>:</u><br>H. GRANT LAW                                  |
| 9  |   | SARA TROPEA<br>AMIR NASSIHI                                  |
| 10 |   | Attorneys for Defendant Ford Motor Company                   |
| 11 |   | • •  |
| 12 | DATED:, 2007                                | LAW OFFICES OF THOMAS J. BRANDI                              |
| 13 |   |  |
| 14 |   | By:<br>DANIEL DELL'OSSO                                      |
| 15 |   | Attorney for Plaintiff Dax Pierson                           |
| 16 |   |  |
| 17 | IT IS SO ORDERED.                           |  |
| 18 |   |  |
| 19 | DATED:                                      | T. 1 - Di 11' II - 'Ii                                       |
| 20 | ·   | Judge Phyllis Hamilton                                       |
| 21 |   |  |
| 22 |   |  |
| 23 |   |  |
| 24 |   |  |
| 25 |   |  |
| 26 | · .   |  |
| 27 |   | 2  |
| 28 |   | JOINT MOTION TO EXTEND TIME<br>TO COMPLETE PRIVATE MEDIATION |

CASE NO. <u>C-06-06503 PJH</u>

CASE NO. C-06-06503 PJH

| 1  | amend its May 30, 2007 requiring the parties to complete mediation by August 31, 2007.   |
|----|--|
| 2  | The parties are currently engaged in expert discovery and will not be prepared to complete a   |
| 3  | meaningful mediation by August 31, 2007. The parties seek an order extending the time to complete  |
| 4  | mediation to September 30, 2007, to allow for further expert discovery and a meaningful mediation.   |
| 5  | 8/10   |
| 6  | DATED:   |
| 7  | m Sanhan   |
| 8  | By: W. GRANT LAW   |
| 9  | AMIR NASSIHI Attorneys for Defendant   |
| 10 | Ford Motor Company   |
| 11 |  |
| 12 | DATED: 8.10. LAW OFFICES OF THOMAS J. BRANDI   |
| 13 | By: Level Williams   |
| 14 | DANIEL DELL'OSSO Attorney for Plaintiff  |
| 15 | Dax Pierson  |
| 16 | IT IS SO ORDERED.  |
| 17 | IT IS SO ORDERED.  |
| 18 |  |
| 19 | DATED: 8/14/07 IT IS SO ORDERED liton  |
| 20 | NO OTHE DATES WILL BE  |
| 21 | NO OTHE DATES WILL BE EXTENDED.  Judge Phyllis J. Hamilton   |
| 22 |  |
| 23 |  |
| 24 | DISTRICT OF CE   |
| 25 |  |
| 26 | ·  |
| 27 | 2 JOINT MOTION TO EXTEND TIME  |
| 28 | TO COMBINE DETAILS AT MEMORY AT COMBINE DETAILS AT COMBINE |